

Mrs H French
Planning Policy
Sevenoaks District Council
Argyle Road
Sevenoaks
Kent TN13 1GN

Our Ref: DHA/12692
david.bedford@dhaplanning.co.uk

23 March 2018

By E-Mail Only

Dear Helen,

**SEVENOAKS LOCAL PLAN REVIEW
A COMMUNITY VISION FOR HARTLEY**

I write further to our recent correspondence in respect of the ongoing development plan review process.

On behalf of the Billings Group, the Leigh Academies Trust and Chapel Wood Enterprises, please find attached further information in respect of our community vision for the sustainable expansion of Hartley.

As you are aware from our 2015 submission, the Billings Group control a significant extent of land within the Sevenoaks District, including Corinthian Sports Ground and land adjacent to Banckside and Valley Road, both of which we consider suitable for a range of community uses. Accordingly, work has been ongoing for the last two years to evaluate and properly understand how the land could be best put to use to the benefit of Hartley residents. A credible evidence based approach is therefore being gathered to support these proposals, which continues to evolve.

The above work has culminated in a comprehensive community vision for Hartley, which we have pleasure in providing alongside this letter.

The document sets out in detail a range of uses that we aspire to deliver with the assistance of Sevenoaks District Council and local stakeholders. These include state of the art replacement school and special educational need (SEN) facilities for the Leigh Academies Trust.

The vision document contains an illustrative masterplan, but for the avoidance of doubt, the proposed vision would provide the following social and physical infrastructure to the benefit of existing and future residents:

- Up to 570 new dwellings, 40% of which would be affordable;
- Provision for starter homes and self build plots;

dha planning

Eclipse House, Eclipse Park, Sittingbourne Road
Maidstone, Kent ME14 3EN

t: 01622 776226 f: 01622 776227

e: info@dhaplanning.co.uk w: www.dhaplanning.co.uk

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- A bespoke retirement village exclusive for the elderly;
- A satellite GP service/medical centre to complement existing facilities in Hartley, Ash Green and Longfield;
- Improved sports provision for which there is an unmet need, including a centre of excellence for indoor racket sports and tennis;
- A new community 4G pitch;
- A replacement primary school and SEN school for Leigh Academies Trust;
- New employment floorspace, including incubator units and start up space;
- Improved and consolidated golf facilities at Redlibbets Golf Course;
- Improved accessibility and vehicle/cycle links between Valley Road and Ash Road providing a “bypass” for southern Hartley
- Public open space; and
- Allotments.

As part of the wider offer, the proposed expansion of land at Banckside can provide the following:

- Up to 230 new dwellings, 40% of which would be affordable;
- Provision of a new country park that could include;
 - o Pedestrian and cycle links to Longfield Railway Station;
 - o A children’s adventure playground and outdoor gym;
 - o A visitor café;
 - o A woodland walk with trim trails;
- A new relief road to allow improved traffic conditions on Castle Hill.

We provide an overview of the land and planning justification in the subsequent sections below and would welcome the opportunity to meet and discuss these exciting proposals in further detail.

Site Overview

Collectively, the promoters of the community vision for Hartley control a substantial amount of land in and around Hartley and as such the intention is to offer genuine community upgrades in the highly accessible location.

The main area of growth is centered around the established Corinthian Sports Club, located on Valley Road. The sports club currently contains two full sized, floodlit football pitches, indoor and outdoor 3G pitches, 9-hole Golf Course and an 18-hole foot golf course. The associated leisure space is available for use by both the football and golf clubs and the latter has traditionally utilised this space as bar, function and pro shop space. The range of uses has also expanded to include a children’s day care nursery within the main sports club building. The land is, by definition, previously developed and could therefore be redeveloped under the current provisions of paragraph 89 of the NPPF.

In respect of the golf use, membership numbers over the past 5 years have seen a gradual decline, which is reflected by national statistics from England Golf that suggest that Private Course membership dropped 20% between 2004 and 2013. Whilst membership numbers have stabilised over the past year, mainly due to the closure of Upper Austin Lodge Golf Course and the uncertainty



over the future of nearby Woodlands Golf Course, there has been a significant decline in use of the ancillary club facilities for functions and club events. Accordingly, the intention is to rationalise the golf offering and transfer membership of the nine-hole course to the higher grade Redlibbets Golf Course, which is also within the control of the Billings Group.

East of the Corinthian nine-hole golf course is land associated with Chapel Wood Enterprises (SHELAA site HO 52). The site comprises a former transport yard containing a workshop building, a glazing business unit, a number of containers and hard standing. There are also other vehicle related uses on the site including a car wash. Bounded by Ash Road and a residential unit to the east, and open countryside to the north, west and south. The site was previously submitted by the landowner but now forms part of the wider masterplan area and would provide direct links to Ash Road.

Wider land within the group control include a rectangular parcel of approximately 22.14 ha of undeveloped land situated between Banckside and Valley Road. This land is situated on the western edge of Hartley and shares a long horizontal boundary with the settlement confines.

All of the land is within the metropolitan Green Belt. However, each parcel shares a boundary with built up areas and are far from being isolated. Furthermore, none of the land has been designated as a Site of Special Scientific Interest (SSSI), Special Area of Conservations (SAC), or a Special Protection Area (SPA) and all is within Flood Zone 1 with the lowest risk of flooding.

In respect of accessibility, the location provides excellent access to the strategic road network, including the A2/M2 Motorway and the M25 Motorway providing direct links to London and the Kent Coast. Longfield mainline railway station is within comfortable walking distance being only 450m from the site. .

Longfield Town centre provides a wide range of services including a Post Office, bank, two supermarkets and a range of local shops and services.

In respect of education facilities, Our Lady of Hartley Roman Catholic Primary School, Hartley Country Primary School, Steephill School, Rowhill School and Longfield Academy provide existing opportunities for schooling in the area and are within walking distance of the areas proposed for growth. Nonetheless, as part of the proposal we seek to further enhance the education offer by providing new state of the art facilities for Hartley County Primary School and Milestone Special Needs School, the latter of which with provide through care for children aged 2 through to 19.

Planning Justification

The need for growth

The National Planning Policy Framework (NPPF) is clear that the purpose of the planning system is to achieve sustainable development, which includes providing the homes needed to meet the needs of present and future generations. It places great emphasis on boosting the supply of housing and meeting the full, objectively assessed need for market and affordable housing.



From a localised perspective, we note that the first stage of the development plan review process has been to prepare a Strategic Housing Market Assessment (SHMA), which identified a need for at least 12,400 houses in Sevenoaks District between 2013 - 2033 (an average of 620 per year). Furthermore, the Government has moved to introduce a standard method for calculating local housing need which could see Sevenoaks District annual housing requirement increase to 698 homes per annum (13,960 for the plan period).

Given the need for housing has increased from 165 dwellings per annum to potentially 698, this is a watershed moment for the Council and clear evidence that Green Belt release is needed.

Urban Extension vs a New Garden Village

There are a number of opportunities to facilitate the growth, including proportionate expansion of existing settlements. Whilst in principle we see the natural evolution of all settlements, the scale of housing needed rules this out as an appropriate strategy unless supported by larger scale growth elsewhere.

The provision of a new garden settlement is also extremely challenging within a district such as Sevenoaks. In this regard, the 2016 Locally-Led Garden Villages, Towns and Cities prospectus announced broad Government support for 'garden villages'. However, these are defined as new settlements of a minimum of 1,500 and that must be embedded with the key garden city principles.

To be a genuine garden village it must be a holistically planned and designed in such a way that development enhances the natural environment and offers high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities. Garden City principles are an indivisible and interlocking framework for delivery, and include:

- *Land value capture for the benefit of the community.*
- *Strong vision, leadership and community engagement.*
- *Community ownership of land and long-term stewardship of assets.*
- *Mixed-tenure homes and housing types that are genuinely affordable.*
- *A wide range of local jobs in the Garden City within easy commuting distance of homes.*
- *Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.*
- *Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience.*
- *Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.*
- *Integrated and accessible transport systems, with walking, cycling and public transport designed to*
- *be the most attractive forms of local transport.*

Having reviewed proposals put to the Council to date, none of these are of a sufficient size, scale or location to deliver genuine garden village principles. For example, we note the emerging promotion



of Broke Hill Golf Course. Whilst situated in reasonable proximity of Knockholt Station, the site is disconnected from an existing settlement and cannot deliver the critical mass of development to generate the services needed to create a new community. Furthermore, the site is located adjacent to the district boundary with the majority of benefits associated with the delivery of housing going to the neighbouring London Borough of Bromley. In simple terms, it cannot be considered to be genuinely sustainable location nor would it meet the needs of Sevenoaks residents.

Taking all of the above into account, the only logical strategy is to support sustainable urban expansion.

As to where these urban extensions should be located, the population of Hartley may only be 5,600, but a further 5,000 live within Longfield creating an interconnected community of some ten and a half thousand people. Whilst for administrative purposes the two villages are separate, the two operate as a single entity and have a far greater range of shops, services and community facilities than settlements with similar populations. In the interests of good planning, the two settlements and their sustainability credentials must be viewed cumulatively as a single settlement.

In light of the cumulative offer of Hartley and Longfield, previous decisions to define Hartley as a rural service village akin to Eynsford, Shoreham and Leigh remain highly questionable. To the contrary, Hartley and Longfield combined have a significantly greater population with significantly wider facilities than Edenbridge, Westerham, Otford and New Ash Green, all of which feature as higher ranking settlements within the Council's settlement hierarchy and two of which have been highlighted as locations for potential 'Exceptional Circumstance' Green Belt release.

It is for this reason that Hartley must be identified as a key area for growth to help meet wider development needs.

Protection of the Green Belt

We do, of course, appreciate that section 9 of the NPPF seeks to protect Green Belt land. Nonetheless, paragraph 83 of the NPPF also states that Green Belt boundaries can be altered in exceptional circumstances, through the preparation or review of the Local Plan. At this time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

Whilst it is acknowledged that the District is heavily constrained, housing targets have fallen well short of the level of the homes that are required and housing prices continue to rise to such a degree that many can no longer stay within the District. Consequently, it is now necessary for Sevenoaks District Council to identify its full market and affordable housing requirement and make every effort to meet it.

Housing pressures alone represent Exceptional Circumstances for Green Belt release and this should take place in the most sustainable locations such as Hartley/Longfield. Furthermore, critical decisions on the distribution of development must only be based upon sound planning arguments rather than dictated by local politics.



The Draft National Planning Policy Framework (DNPPF) was published for consultation in March 2018. It is yet to be formally published, but provides a clear indication of the Government's direction of travel with planning policy.

The DNPPF confirms that local plans should continue to provide for objectively assessed needs for development. From a more strategic perspective, it is clear that planning authorities must fully examine "all other reasonable options" for meeting their identified development needs before releasing Green Belt, but the Exceptional Circumstances provision remains. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

In respect of public transport links, Longfield mainline railway station is situated approximately 450m immediately north of the land at Banckside and 1200m from Corinthian Sports Ground. The line provides fast direct links to Central London via London Victoria (3 per hour) and other important stations including Bromley South and coastal towns such as Canterbury East, Dover Priory and Ramsgate. Furthermore, the site benefits from easy access to the High Speed rail network at Ebbsfleet International only 5km north of the site.

Numerous bus routes serve Hartley and Longfield and provide links to neighbouring settlements and major centres such as Gravesend where plentiful employment and leisure opportunities exist. Likewise, the settlements location provides excellent access to the strategic road network, including the A2/M2 Motorway and the M25 Motorway providing direct links to London and the Kent Coast.

Hartley and Longfield benefits from excellent links to a number of important leisure and community facilities, including direct bus links to Bluewater Shopping Centre only 5km away, a regionally important retail, entertainment and leisure complex. Likewise, Hartley and Longfield is situated only 5km south east of Darent Valley Hospital, which important provides Accident and Emergency facilities as well as an Outpatients Department, Physiotherapy facilities and a Minor Injuries Clinic as well as providing many local job opportunities. None of the Council's higher order settlements benefit from better proximity to a major hospital or regionally important retail location.

In respect of the second requirement, the vision for Hartley would see substantial compensatory improvements to the environmental quality and accessibility of remaining Green Belt land by virtue of the creating of a new community park.

Exceptional Circumstances

Case law dictates that housing need alone is tantamount to the exceptional circumstance to justify Green Belt release as part of the development plan review. Nonetheless, we note that Sevenoaks District Council is defining 'exceptional circumstances' as instances where development could remedy infrastructure deficiencies and provide over 100 dwellings.



Whilst we dispute the approach, the community vision for Hartley falls soundly within the Council's parameters and we are extremely concerned about the lack of acknowledgement of the benefits we can provide. For example, the Council's evidence base confirms that there is a lack of facilities for young people in Hartley. Improved multipurpose sports and community facilities would therefore assist in the delivery of this infrastructure and remedy an identified need. The same document confirms that many Hartley residents travel to Dartford or Gravesend for retail and services and that this expenditure is therefore lost out of district and this could be partly remedied with further growth and the provision of improved facilities.

The sports and recreation strategy identifies that Hartley is lacking a country park, which has informed a specific response from our client.

The provision of two new schools is a core aspect of the proposed vision and has directly been informed by the requirement of the Leigh Academies Trust (LAT) in light of the growing need for better SEN facilities and wider increased intake. Correspondence from LAT is attached for information.

Finally, it should be noted that the proposed vision makes significant provision for specialist elderly care accommodation. In this regard, within the 10 minute drive time there are currently (2017) 30,247 people, with 3,243 over the age of 75. The elderly population is set to grow by 36.1% over the next 10 years to 4,413. There is therefore a pressing need for retirement accommodation for the elderly within the current plan period.

In summary, the proposed expansion of Hartley could provide compelling social infrastructure benefits as outlined within our vision document and therefore 'exceptional circumstances' exist whether it be by the Council's definition or that advocated in case law. Furthermore, our vision is based on deliverable promises that are underpinned by evidence and genuine documented need.

Taking all of the above into account, we hope you agree that the attached vision for Hartley represents an exciting opportunity to improve the lives of residents for the better and deserves to be given detailed consideration as an integral part of the Local Plan review process to ensure consistency and fairness.

I trust the content of the documentation is clear and we look forward to meeting and discussing this in further detail in the near future.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D Bedford', with a horizontal line underneath.

David Bedford MRTPI - *Associate Director*

On behalf of the Billings Group, Leigh Academies Trust and Chapel Wood Enterprises